

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-cv-20727-ALTMAN

RYAN BRESLOW, *et al.*,

Plaintiffs,

v.

MARK PHILLIPS, *et al.*,

Defendants.

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DECLARATION OF AIDAN HEINTZMAN

I, Aidan Heintzman, make the following declaration based on my personal knowledge:

1. My name is Aidan Heintzman. I am over the age of 18, competent to testify, and have personal knowledge of the matters stated herein.

2. I am a resident of West Palm Beach, Florida.

3. I was a member of the Movement DAO community from May 2022 to August 2022. “DAO” stands for decentralized autonomous organization. As a member of that community, I am familiar with the nature of the Movement DAO platform.

4. The Movement DAO platform is a product that was described in a white paper hosted on Gitbook, which was published online. The Movement DAO platform is comprised of certain essential elements. For example, the central element of the Movement DAO is a platform with a user interface where a social impact group can establish their own DAO to advance their

social impact cause using applications and tools hosted on the Movement DAO platform. This user interface would be a public website, and the tools available on the platform would enable the social impact group to create and manage its own DAO to organize, fundraise, and do other activities related to its social impact mission. The Movement DAO's user interface is still a work in progress, and, based on my understanding, it has never been launched to the public.

5. Another central element of the Movement DAO is the issuance of MOVE tokens. Those tokens function as voting power within the Movement DAO community (*i.e.*, one MOVE token is equivalent to one vote). MOVE tokens are to be used by Movement DAO community members to vote on proposals related to, among other things, the governance of the Movement DAO. I never received any MOVE tokens, and, based on my understanding, MOVE tokens were never created.


6. In August 2022, the Movement DAO community was informed that the project's budget was being rededicated exclusively to platform development & engineering. My understanding is that this was done in an effort to make a push to complete coding on the project so that the Movement DAO could launch. In May 2022, the Movement DAO community was informed the platform would launch in August 2022, but it did not.

7. In 2022, members of the Movement DAO community assisted a project called PeaceDAO. That project was hosted on another platform called Juicebox, which is not affiliated with Movement DAO. PeaceDAO was not hosted on the Movement DAO platform (nor could it have been because the Movement DAO platform has not launched). Because members of the Movement DAO community provided assistance in the form of coding, organization, outreach, etc. to PeaceDAO, the operators of PeaceDAO paid "tribute" (provided a small payment) to

Movement DAO as thanks and compensation for the time and talent that Movement DAO community members offered PeaceDAO.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20 day of March 2023.

DocuSigned by:

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Aidan Hientzman

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served by the Court's CM/ECF system on March 23, 2023 on all counsel of record.

/s/ Jamie L. Katz
Jamie L. Katz